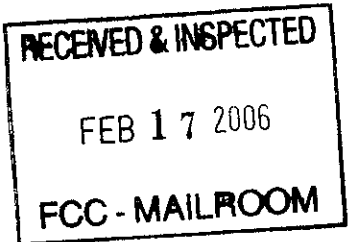


The Roman Catholic Diocese of Burlington
Office of Communications
351 North Avenue
P.O. Box 489
Burlington, VT 05402-0489



Phone: (802) 658-6110
Fax: (802) 862-2623

February 14, 2006

Case Identifier #: CGB-CC-0038

Attention: Amelia Brown, Disability Rights Office
Federal Communications Commission
445 12th Street, S. W.
Washington, D.C. 20554

Reference: Roman Catholic Diocese of Burlington
Video Programming Accessibility
Petition for Waiver of Closed Captioning Requirements -
"TV Mass"

**In Response to Request for Further Information/Affidavits
"Undue Burden" Exemption**

Dear Ms. Brown:

Submitted herewith is our response to your letter of January 11, 2006 in which you requested additional information on our original petition dated December 5th, 2005. *(Please See Exhibit 5.)* We feel it propitious to begin with a short history of our *TV Mass*.

History of TV Mass: WCAX TV has been airing a version of the TV Mass since 1960...free of charge to the Roman Catholic Diocese of Burlington. In 1990, the Office of Communications contacted all cable access stations in Vermont in order to attain free broadcast time and expand our programming services. We offered a weekly program package containing our *TV Mass*, our new half-hour "*Journey*" program, which is a potpourri of spiritual presentations; and we also offered our 15-minute "*Religion Report*," a newscast on ecumenical religious affairs. We expanded into the Cable Access market because not only was it free, but we were able to broadcast two additional programs, select our broadcast times to target and serve the most viewers, and we were also able to run the *TV Mass* more than once per weekend.

However, we also were aware that WCAX TV reaches and serves so many more people than our makeshift Adelphia Cable Network, and over the years the *TV Mass* on WCAX has often been the #1 watched program in our market. Plus, WCAX TV reaches into New York and Canada, and thus provides access to the TV Mass to many people who are not served by or who do not have the financial means to subscribe to Adelphia Cable.

We have been very happy with this arrangement for some 15 years. However, this past September, the *TV Mass* on WCAX TV was moved from its 8AM Sunday timeslot to 6AM Sunday. *(Please see Exhibit One)* Many viewers lamented the earlier hour, (WCAX received some 40 letters and emails) and the drop in voluntary financial support of the *TV Mass* was immediately obvious. Total mail-in contributions to support the production of the *TV Mass* fell from a customary \$2,500 plus income in any given six-month period to just \$750. *(Please see Exhibit Two)*

The Office of Communications has already been informed by our Vicar General that we will not be granted any increase in our *TV Mass* budget for the upcoming fiscal year of July 11, 2006 through June 30, 2007. The *TV Mass* currently costs the diocese about \$30,364.70 to produce, and our income for the year 2005 only amounted to \$3,192.70. (*Please see Exhibit Three*)

Thus this new expense threatens to push the *TV Mass* out of the Public Broadcasting arena into cable only, leaving many *TV Mass* participants, especially the elderly, housebound and the infirmed, without a place "to go to Mass." We do not believe that this new public service of captioning for the deaf is at all intended to penalize others in need. And we certainly believe in the captioning as an excellent and worthy service to the hearing impaired. So we will probably feel frustrated and dissatisfied with our attempts to serve all the public whichever way you rule on our petition.

However, it would be a shame to penalize a much broader audience in need (the elderly and infirmed) served by our *TV Mass* on WCAX because we cannot afford captioning for another equally deserving, but more limited audience of the hearing impaired.

And since our present solicitation for donations on WCAX TV has produced drastically reduced results, (see reference on "*TV Mass Expenses*" sheet) we will most likely not even meet our usual budgeted quota. Our contact at WCAX TV recognizes our dilemma, and has indicated she will request moving the *TV Mass* to a more propitious broadcast time, from 6AM to 7AM. (*Please see Exhibit One.*) Heretofore, the *TV Mass* was broadcast at 8:00AM, and regularly drew donations over \$5,000 per year.

We would like to request an exemption, therefore, for captioning our weekly *TV Mass* on WCAX TV. We do this fully realizing that we will not be truly at ease and satisfied with your approval until we can also find financing to incorporate captioning for the deaf on our televised Masses. Perhaps we can solicit viewers and benefactors to support this endeavor, which we find most in keeping with our mission to serve those with special needs.

Please note the following enclosures which support our request for this exemption.

Yours in public service,



Gloria J. Gibson
Director of Communications
Roman Catholic Diocese of Burlington

Enclosures:

- Exhibit One: Letter of Notification of Captioning Requirements from WCAXTV – Meredith Neary
- Exhibit Two: *TV Mass* Loss in Income: Unsolicited Gifts
- Exhibit Three: Actual Expenditures for *TV Mass*, January 1, 2005 – December 31st, 2005
- Exhibit Four: Affidavits of Expenditures-Income
- Exhibit Five: Original Letter to Marlene Dorch, FCC, dated December 5, 2005 –



WCAX-TV

3

Exhibit
one

January 26, 2006

Gloria Gibson
Catholic Diocese of Burlington
351 North Avenue
Burlington, VT 05401

Dear Gloria,

This letter certifies that WCAX-TV is currently airing "The Catholic Mass" at 6:00 AM every Sunday morning for the 2005 – 2006 television season, effective September 11, 2005. Later this season we will re-assess our Sunday morning programming and may change time periods for some shows, including "The Mass".

Due to the new closed-captioning requirements of the FCC we will be unable to air "The Mass" unless you can either provide the show with closed-captioning or pay us to post-produce the show and add captioning. We have currently assessed a charge of \$110.00 per episode to provide this service.

WCAX-TV has aired the Catholic Mass since 1960. We look forward to continuing this relationship into the future.

Cordially,

Meredith Neary
Programming/Public Service Coordinator

Exhibit
Two

Communications Department
For the Six Months Ending December 31, 2005

Account Number	Account Description	Current Month	YTD	YTD Budget	YTD as a	Fiscal Year	Fiscal Year	Variance
		Actual	Actual		% of Budget	Budget	Actual	
REVENUE								
01-2510-310-4110	COMM Unsolicited Gifts	235	775	2,500	31.00%	5,000	775	4,225
01-2510-310-4120	COMM Collections	0	8,832	4,300	205.40%	8,600	8,832	(232)
01-2510-310-4505	COMM Sales-Subscriptions	0	636	100	636.20%	200	636	(436)
	Total Revenue	235	10,243	6,900	148.46%	13,800	10,243	3,557
EXPENSES								
01-2510-000-5605	COMM Admin/Alloc Building Exp	1,168	7,008	7,011	99.96%	14,022	7,008	7,014
01-2510-310-5000	COMM Salaries	11,075	44,079	43,797	100.64%	90,375	44,079	46,296
01-2510-310-5100	COMM Employee Benefits	1,371	8,226	8,224	100.03%	16,447	8,226	8,221
01-2510-310-5210	COMM Promotions	0	0	6,000	0.00%	6,000	0	6,000
01-2510-310-5215	COMM Stipends	215	4,016	1,920	209.19%	3,000	4,016	(1,016)
01-2510-310-5230	COMM Advertising	100	100	5,500	1.82%	6,000	100	5,900
01-2510-310-5420	COMM Equip Repairs	0	1,752	3,250	53.90%	6,500	1,752	4,748
01-2510-310-5625	COMM Dues/Memberships	0	210	360	58.33%	360	210	150
01-2510-310-5640	COMM Professional Fees	15	1,164	3,911	29.75%	8,600	1,164	7,436
01-2510-310-5701	COMM Postage	407	1,556	1,800	86.44%	4,100	1,556	2,544
01-2510-310-5710	COMM Supplies	471	1,259	2,920	43.10%	5,370	1,259	4,111
	Total Expenses	14,822	69,370	84,692	81.91%	160,774	69,370	91,404
	Surplus/(Deficit)	(14,587)	(59,126)	(77,792)	76.01%	(146,974)	(59,126)	(87,847)

General Ledger Account Balances

Date	Doc #	Description	Cust or Vend #	Customer or Vendor Name	Amount
0125103104110					
7/13/2005	INV062954	TVMASS	09019	TVMASS	TV -10.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	TV -25.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	TV -100.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	TV -15.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	TV -10.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	TV -10.00
8/22/2005	INV064149	8/22/2005	09019	TVMASS	TV -50.00
8/22/2005	INV064149	8/22/2005	09019	TVMASS	TV -20.00
8/22/2005	INV064149	8/22/2005	09019	TVMASS	TV -25.00
8/22/2005	INV064149	8/22/2005	09019	TVMASS	TV -20.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	TV -25.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	TV -10.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	TV -10.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	TV -10.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	TV -20.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	TV -80.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	TV -10.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	TV -10.00
10/27/2005	INV065900	DONATIONS	09019	TVMASS	TV -5.00
10/27/2005	INV065900	DONATIONS	09019	TVMASS	TV -30.00
11/18/2005	INV066654	DONATIONS	09019	TVMASS	TV -5.00
11/18/2005	INV066654	DONATIONS	09019	TVMASS	TV -15.00
11/18/2005	INV066654	DONATIONS	09019	TVMASS	TV -25.00
12/6/2005	INV066934	DONATIONS	09019	TVMASS	TV -90.00
12/6/2005	INV066934	DONATIONS	09019	TVMASS	TV -20.00
12/6/2005	INV066934	DONATIONS	09019	TVMASS	TV -35.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	TV -10.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	TV -25.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	TV -10.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	TV -20.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	TV -25.00
0125103104110		COMM Unsolicited Gifts			-775.00
					-775.00

"TV Mass" Expenses
Roman Catholic Diocese of Burlington – Office of Communications

1. Brian Sumner (Producer/Director) - Payroll

Pre-Production: 8 hrs/wk
Actual Production: 2/hr wk
Post Production: 12 hrs/wk
Website Posting: 1 hr/wk

23 hrs/wk@ $\$14.12$ hr = (**$\$324.76$ per week**) - $\$16,887.52$ per year

2. Gloria Gibson (Communications Director) – Payroll

Promotion/Publicity/Management: 2 hrs/wk@ $\$25.95$ = (**$\$51.84$ per week**) -
 $\$2,695.68$ per year

3. Video-Audio-Studio Equipment expenses for purchase and repair: Total Budget: $\$6,500.00$ /yr. **Estimated cost for TV Mass Only – 50% or $\$3,250.00$**

4. Stipends: for celebrants, singers and musicians, camera operators, audio, set-up & clean-up crews: $\$4,415.00$ per year

5. Professional Fees: Earthlink, Inc.-Com: Website for TV Mass - $\$456.35$ per year

6. Supplies: Mass Flowers, Mass Missals, Order of Prayer Booklets - $\$1100.15$ per year

7. UPS Services for Tape Deliveries to TV Stations

6 master tapes - $\$30.00$ /wk = $\$1,560.00$ per year

Total Expenses for TV Mass 1/1/2005 – 12/31/2005: $\$30,364.70$

Total Income 1/1/2005 – 12/31/05: Unsolicited Gifts: $\$3,192.70$

Please Note: Since the TV Mass on WCAX TV has moved from 8AM to 6AM on Sunday mornings, there was an immediate drop in "unsolicited gifts." **The goal is $\$2,500$ per 6 months** to help off-set out of pocket expenses for the TV Mass. But during the six-month period when WCAX moved the TV Mass to 6AM, the income from **gifts dropped to $\$750$ total.**

Estimated cost for captioning, done by WCAX TV at $\$110$ per TV Mass:
 $\$5,720$ per year.

Estimated total annual costs with captioning for the deaf: $\$36,084.70$

THREE

Comm Accounts by Reference C ode
1/1/2005-12/31/2005

Date	Doc #	Description	Cust or Vend #	Customer or Vendor Name	Amount
TV MASS					
0	103105215	COMM Stipends			
1/19/2005	VO045525	TV MASS STIPEND - CAMERA/CLEAN UP	99004-CO	PROGRAM VENDORS-COM	35.00
1/19/2005	VO045526	TV MASS STIPEND - CAMERA/DIRECT	99004-CO	PROGRAM VENDORS-COM	30.00
1/19/2005	VO045527	TV MASS STIPEND- SET-UP/CAMERA/CLEAN UP	99004-CO	PROGRAM VENDORS-COM	50.00
1/19/2005	VO045528	TV MASS STIPEND - AUDIO	99004-CO	PROGRAM VENDORS-COM	30.00
1/28/2005	VO045705	TV MASS STIPEND - MUSIC	99004-CO	PROGRAM VENDORS-COM	100.00
1/28/2005	VO045706	TV MASS STIPEND-SET-UP,CAMERA,CL EAN-UP	99004-CO	PROGRAM VENDORS-COM	50.00
1/28/2005	VO045707	TV MASS STIPEND - AUDIO & CLEAN UP	99004-CO	PROGRAM VENDORS-COM	35.00
1/28/2005	VO045708	TV MASS STIPEND - CAMERA, CLEAN UP	99004-CO	PROGRAM VENDORS-COM	35.00
2/14/2005	VO046050	FLOOR DIRECTOR, CLEAN UP	99004-CO	PROGRAM VENDORS-COM	30.00
2/14/2005	VO046051	MUSIC	99004-CO	PROGRAM VENDORS-COM	100.00
2/14/2005	VO046052	SET-UP,CAMERA, CLEAN UP	99004-CO	PROGRAM VENDORS-COM	50.00
2/14/2005	VO046053	CAMERA, CLEAN UP	99004-CO	PROGRAM VENDORS-COM	35.00
2/14/2005	VO046054	AUDIO CLEAN UP	99004-CO	PROGRAM VENDORS-COM	35.00
2/28/2005	VO046340	TV MASS STIPEND-SETUP/CAMERA/CLE AN-UP	99004-CO	PROGRAM VENDORS-COM	100.00
2/28/2005	VO046341	TV MASS STIPEND-SET-UP/CAMERA/CL EAN-UP	99004-CO	PROGRAM VENDORS-COM	45.00
2/28/2005	VO046342	TV MASS STIPEND-SET-UP/CAMERA/CL EANUPX2	99004-CO	PROGRAM VENDORS-COM	60.00
2/28/2005	VO046343	TV MASS STIPEND SET-UP/CAMERA/CLEAN-UPX2	99004-CO	PROGRAM VENDORS-COM	60.00
2/28/2005	VO046344	TV MASS STIPEND - MUSIC	99004-CO	PROGRAM VENDORS-COM	75.00
3/7/2005	VO046498	CELEBRANT	99004-CO	PROGRAM VENDORS-COM	50.00
3/7/2005	VO046499	CAMERA	99004-CO	PROGRAM VENDORS-COM	30.00
3/7/2005	VO046500	AUDIO/CLEAN-UP	99004-CO	PROGRAM VENDORS-COM	35.00
3/7/2005	VO046501	CAMERA/CLEAN-UP	99004-CO	PROGRAM VENDORS-COM	35.00
3/29/2005	VO046937	TV MASS STIPEND-MUSIC 3/14	99004-CO	PROGRAM VENDORS-COM	100.00
3/29/2005	VO046938	TV MASS STIPEND - CAMERA 3/14	99004-CO	PROGRAM VENDORS-COM	30.00
3/29/2005	VO046939	TV MASS STIPEND - AUDIO/CLEAN - UP 3/14	99004-CO	PROGRAM VENDORS-COM	35.00
3/29/2005	VO046940	TV MASS STIPEND - CAMERA/CLEAN UP 3/14	99004-CO	PROGRAM VENDORS-COM	35.00
3/29/2005	VO046941	TV MASS STIPEND CELEBRANT 3/14	99004-CO	PROGRAM VENDORS-COM	50.00
4/20/2005	VO047434	TV MASS STIPEND CAM/CEAN UP 4/4 & 4/11	99004-CO	PROGRAM VENDORS-COM	70.00
4/20/2005	VO047435	TV MASS - AUDIO/CLEAN UP 4/4 & 4/11	99004-CO	PROGRAM VENDORS-COM	70.00
4/20/2005	VO047436	DIR/CAM/SET-UP/CLEAN-UP 4/4 & 4/11	99004-CO	PROGRAM VENDORS-COM	100.00
4/20/2005	VO047437	TV MASS - CAMERA 4/4	99004-CO	PROGRAM VENDORS-COM	30.00
4/20/2005	VO047438	TV MASS - MUSIC 4/4	99004-CO	PROGRAM VENDORS-COM	100.00
4/20/2005	VO047439	TV MASS - CELEBRANT 4/11	99004-CO	PROGRAM VENDORS-COM	50.00
4/20/2005	VO047440	TV MASS - MUSIC 4/11	99004-CO	PROGRAM VENDORS-COM	75.00
5/10/2005	VO047870	TV MASS STIPEND - CELEBRANT	99004-CO	PROGRAM VENDORS-COM	50.00
5/10/2005	VO047871	TV MASS-SET-UP/DIRECTOR/CLE AN	99004-CO	PROGRAM VENDORS-COM	50.00
5/10/2005	VO047872	TV MASS - CAMERA/CLEAN UP	99004-CO	PROGRAM VENDORS-COM	35.00
5/10/2005	VO047873	TV MASS/ AUDIO/CLEAN UP	99004-CO	PROGRAM VENDORS-COM	35.00

Comm Accounts by Reference C ode
1/1/2005-12/31/2005

Date	Doc #	Description	Cust or Vend #	Customer or Vendor Name	Amount
TV MASS					
C	103105215	COMM Stipends			
5/10/2005	VO047874	TV MASS - MUSIC	99004-CO	PROGRAM VENDORS-COM	75.00
5/10/2005	VO047875	TV MASS - CAMERA	99004-CO	PROGRAM VENDORS-COM	30.00
5/27/2005	VO048319	MUSIC	99004-CO	PROGRAM VENDORS-COM	50.00
5/27/2005	VO048320	TV MASS MUSIC	99004-CO	PROGRAM VENDORS-COM	50.00
5/27/2005	VO048321	TV MASS STIPEND	99004-CO	PROGRAM VENDORS-COM	50.00
5/27/2005	VO048322	TV MASS - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
5/27/2005	VO048323	TV MASS STIPEND CREW	99004-CO	PROGRAM VENDORS-COM	50.00
5/27/2005	VO048324	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
5/27/2005	VO048325	TV MASS STIPEND - PRODUCTION CREW	99004-CO	PROGRAM VENDORS-COM	50.00
5/27/2005	VO048326	TV MASS STIPEND - PRODUCTION CREW	99004-CO	PROGRAM VENDORS-COM	35.00
5/27/2005	VO048327	TV MASS STIPEND - PRODUCTION CREW	99004-CO	PROGRAM VENDORS-COM	35.00
5/27/2005	VO048328	TV MASS STIPEND - PRODUCTION CREW	99004-CO	PROGRAM VENDORS-COM	30.00
6/16/2005	DB000732		-	-	-50.00
6/29/2005	VO049006	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
6/29/2005	VO049007	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
6/29/2005	VO049008	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	50.00
6/29/2005	VO049009	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
6/29/2005	VO049010	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
6/29/2005	VO049011	TV MASS STIPEND - MUSIC	99004-CO	PROGRAM VENDORS-COM	50.00
6/29/2005	VO049012	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	50.00
7/14/2005	VO049385	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	50.00
7/14/2005	VO049386	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
2005	VO049387	TV MASS STIPEND - MUSIC	99004-CO	PROGRAM VENDORS-COM	50.00
6/30/2005	JRNL028013		-	-	206.25
8/1/2005	VO049837	7/25/05 MUSIC	99004-CO	PROGRAM VENDORS-COM	50.00
8/1/2005	VO049840	7/25/05 MUSIC	99004-CO	PROGRAM VENDORS-COM	35.00
8/1/2005	VO049841	7/25/05 MUSIC	99004-CO	PROGRAM VENDORS-COM	35.00
8/1/2005	VO049842	7/25/05 MUSIC	99004-CO	PROGRAM VENDORS-COM	50.00
7/31/2005	JRNL028013		-	-	-206.25
8/11/2005	VO050143	TV MASS 8/8/05	99004-CO	PROGRAM VENDORS-COM	50.00
8/11/2005	VO050144	TV MASS 8/8/05	99004-CO	PROGRAM VENDORS-COM	30.00
8/11/2005	VO050145	TV MASS 8/8/05	99004-CO	PROGRAM VENDORS-COM	35.00
8/11/2005	VO050147	TV MASS 8/8/05	99004-CO	PROGRAM VENDORS-COM	50.00
8/11/2005	VO050148	TV MASS 8/8/05	99004-CO	PROGRAM VENDORS-COM	50.00
8/24/2005	VO050415	TV MASS	99004-CO	PROGRAM VENDORS-COM	35.00
8/24/2005	VO050416	TV MASS	99004-CO	PROGRAM VENDORS-COM	35.00
8/24/2005	VO050417	8/24/05 DS	99004-CO	PROGRAM VENDORS-COM	50.00
9/13/2005	VO050820	TV MASS STIPEND MUSIC	99004-CO	PROGRAM VENDORS-COM	50.00
9/13/2005	VO050821	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
9/13/2005	VO050822	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
9/20/2005	VO050978	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
9/20/2005	VO050979	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
10/4/2005	VO051282	TV MASS STIPEND - MUSIC	99004-CO	PROGRAM VENDORS-COM	100.00
10/4/2005	VO051283	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
10/4/2005	VO051284	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
10/18/2005	VO051652	TV MASS STIPEND - MUSIC	99004-CO	PROGRAM VENDORS-COM	75.00
10/18/2005	VO051653	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
11/18/2005	VO051654	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
11/1/2005	VO052013	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
11/3/2005	VO052014	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
11/3/2005	VO052015	TV MASS STIPEND - MUSIC	99004-CO	PROGRAM VENDORS-COM	75.00

Comm Accounts by Reference Code
1/1/2005-12/31/2005

Date	Doc #	Description	Cust or Vend #	Customer or Vendor Name	Amount
TV MASS					
<hr/>					
103105215 COMM Stipends					
11/17/2005	VO052297	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	35.00
11/17/2005	VO052298	TV MASS STIPEND - MUSIC	99004-CO	PROGRAM VENDORS-COM	50.00
11/29/2005	VO052513	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	20.00
11/29/2005	VO052514	TV MASS STIPEND - CREW	99004-CO	PROGRAM VENDORS-COM	20.00
12/16/2005	VO052895	TV MASS STIPEND 12/12-12/13	99004-CO	PROGRAM VENDORS-COM	70.00
12/16/2005	VO052896	TV MASS STIPEND MUSIC 12/12	99004-CO	PROGRAM VENDORS-COM	75.00
12/16/2005	VO052897	TV MASS STIPEND 12/12 & 12/13	99004-CO	PROGRAM VENDORS-COM	70.00
<i>Total 0125103105215</i>					4415.00
<hr/>					
0125103105640 COMM Professional Fees					
3/17/2005	VO046717	1YEAR OF SERVICE	05971-CO	EARTHLINK INC - COM	456.35
<i>Total 0125103105640</i>					456.35
<hr/>					
0125103105701 COMM Postage					
3/29/2005	VO046942	POSTAGE	01783-CO	POSTMASTER-COMM	146.00
9/13/2005	VO050819	STAMPS	01783-CO	POSTMASTER-COMM	146.00
12/30/2005	VO053163	2 ROLL 0.39 & 72 1.00 STAMPS	01783-CO	POSTMASTER-COMM	150.00
<i>Total 0125103105701</i>					442.00
<hr/>					
0125103105710 COMM Supplies					
1/3/2005	VO045141	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
2/25/2005	VO046280	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	105.25
3/15/2005	VO046686	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
2005	VO046776	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
4/11/2005	VO047231	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
4/25/2005	VO047508	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
5/16/2005	VO048012	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
5/23/2005	VO048174	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
5/27/2005	VO048310	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
6/20/2005	VO048790	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
6/27/2005	VO048931	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
7/18/2005	VO049469	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
7/28/2005	VO049693	SEAS MISSAL RVSD TEXT & FREIGHT	01743-CO	J S PALUCH CO, INC-COM	170.00
8/12/2005	VO050165	8/4/05	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
9/13/2005	VO050812	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
9/26/2005	VO051063	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
10/5/2005	VO051347	2006 ORDER OF PRAYER	01995-CO	VT CHURCH SUPPLY-COM	13.95
10/12/2005	VO051491	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
10/24/2005	VO051771	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
11/3/2005	VO052011	ADVENT WREATH	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	73.00
12/16/2005	VO052889	FLOWERS	07115-CO	CLAUSSENS	71.95
12/19/2005	VO052937	FLOWERS	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
12/22/2005	VO053037	flowers	04736-CO	KATHY & CO FLOWERS&GIFTS-COM	37.00
<i>Total 0125103105710</i>					1100.15
<i>Total TV MASS</i>					3220.80
					3220.80

Comm Accounts by Reference C ode
1/1/2005-12/31/2005

Date	Doc #	Description	Cust or Vend #	Customer or Vendor Name	Amount
TV MASS					
6	103104110	COMM Unsolicited Gifts			
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-100.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-10.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-10.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-5.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-20.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-25.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-25.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-100.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-20.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-20.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-25.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-20.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-50.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-300.00
1/19/2005	INV057734	DONATIONS	09019	TVMASS	-25.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-10.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-20.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-35.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-15.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-10.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-10.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-25.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-10.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-25.00
2/14/2005	INV058575	DONATIONS	09019	TVMASS	-50.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-25.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-15.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-15.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-50.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-15.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-15.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-15.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-15.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-15.00
4/1/2005	INV059859	VT CATHOLIC DAUGHTERS	09019	TVMASS	-50.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-30.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-50.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-7.70
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-50.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-100.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-10.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-200.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-10.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-20.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-50.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-25.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-5.00
4/25/2005	INV060409	DONATIONS	09019	TVMASS	-50.00
6/3/2005	INV061733	DONATIONS	09019	TVMASS	-50.00
6/3/2005	INV061733	DONATIONS	09019	TVMASS	-10.00
6/3/2005	INV061733	DONATIONS	09019	TVMASS	-15.00
6/3/2005	INV061733	DONATIONS	09019	TVMASS	-20.00
6/3/2005	INV061733	DONATIONS	09019	TVMASS	-10.00
6/3/2005	INV061733	DONATIONS	09019	TVMASS	-10.00

Comm Accounts by Reference C ode
1/1/2005-12/31/2005

Date	Doc #	Description	Cust or Vend #	Customer or Vendor Name	Amount
TV MASS					
C	103104110	COMM Unsolicited Gifts			
6/3/2005	INV061733	DONATIONS	09019	TVMASS	-500.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	-15.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	-10.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	-10.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	-10.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	-25.00
7/13/2005	INV062954	TVMASS	09019	TVMASS	-100.00
8/22/2005	INV064149	8/22/2005	09019	TVMASS	-50.00
8/22/2005	INV064149	8/22/2005	09019	TVMASS	-20.00
8/22/2005	INV064149	8/22/2005	09019	TVMASS	-25.00
8/22/2005	INV064149	8/22/2005	09019	TVMASS	-20.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	-10.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	-10.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	-10.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	-20.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	-80.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	-25.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	-10.00
9/8/2005	INV064535	TV MASS DONATIONS	09019	TVMASS	-10.00
10/27/2005	INV065900	DONATIONS	09019	TVMASS	-5.00
10/27/2005	INV065900	DONATIONS	09019	TVMASS	-30.00
11/18/2005	INV066654	DONATIONS	09019	TVMASS	-5.00
11/18/2005	INV066654	DONATIONS	09019	TVMASS	-15.00
11/18/2005	INV066654	DONATIONS	09019	TVMASS	-25.00
11/29/2005	INV066934	DONATIONS	09019	TVMASS	-90.00
12/6/2005	INV066934	DONATIONS	09019	TVMASS	-20.00
12/6/2005	INV066934	DONATIONS	09019	TVMASS	-35.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	-20.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	-25.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	-10.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	-25.00
12/19/2005	INV067227	DONATIONS	09019	TVMASS	-10.00
<i>Total</i>					-3192.70



The Roman Catholic Diocese of Burlington

Office of Communications

351 North Avenue
P.O. Box 489
Burlington, VT 05402-0489

Phone: (802) 658-6110
Fax: (802) 862-2623

I, Gloria J. Gibson, Director of Communications for the Roman Catholic Diocese of Burlington, do hereby swear that to the best of my knowledge all information contained in this petition to the Federal Communications Commission, Case # CGB-CC-0038, is correct.

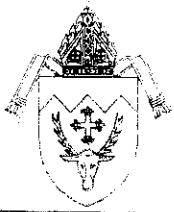
A handwritten signature in cursive script, reading "Gloria J. Gibson", written over a horizontal line.

Gloria J. Gibson
Roman Catholic Diocese of Burlington
351 North Avenue
Burlington, VT 05401

Signed and witnessed this 15th Day of February in the year 2006 in the presence of:

A handwritten signature in cursive script, reading "Claire Lewis", written below the text "Signed and witnessed this 15th Day of February in the year 2006 in the presence of:".

Exhibit
Four



The Roman Catholic Diocese of Burlington

351 North Avenue
P.O. Box 489
Burlington, VT 05402-0489

Phone: (802) 658-6110
Fax: (802) 951-2471

• FINANCE OFFICE

I, Donna LeBlanc, Accounting Manager for the Roman Catholic Diocese of Burlington, do hereby swear that to the best of my knowledge all financial information contained in Exhibits Two and Three of this petition to the Federal Communications Commission, Case # CGB-CC-0038, is correct.

Donna LeBlanc

Donna LeBlanc
Roman Catholic Diocese of Burlington
351 North Avenue
Burlington, VT 05401

Signed and witnessed this 15th Day of February in the year 2006 in the presence of:

Clare Lewis



The Roman Catholic Diocese of Burlington
Office of Communications

351 North Avenue
P.O. Box 489
Burlington, VT 05402-0489

Phone: (802) 658-6110
Fax: (802) 662-2620

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
20554

Attention: CGB Room 3-B431

Reference: Roman Catholic Diocese of Burlington
Video Programming Accessibility
Petition for Waiver of Closed Captioning Requirements – “The
TV Mass”
Based on Undue Burden

The Roman Catholic Diocese of Burlington has been broadcasting a weekly “TV Mass” since 1960. We have relied mainly on the generosity and cooperation of commercially-licensed television stations to bring this half-hour Mass to Vermont’s elderly, shut-ins, and physically impaired Catholics. (Many non-Catholics also have expressed their appreciation for this service.)

WCAX TV has been the most loyal and longest serving outlet for this very popular service, never charging us for valuable broadcast time. They even produced and pre-taped the TV Mass for us in their own studios, free of charge. (By the way, over the years this same TV Mass has also produced #1 ratings for WCAX TV across the state.)

When space and time constraints became troublesome, the Diocese began pre-recording the TV Mass ourselves in the diocesan chapel. We have relied on volunteers, our own equipment, and personnel to produce the Mass, but we still run about \$10,000 short of budget most years. Most of this expense is covered by the generosity of the TV Mass audience who contribute through donations to the TV Mass Society.”

The FCC’s closed captions regulation would entail more expenses in the production of our public service presentation of the TV Mass than can be covered in our current budget. Even though WCAX TV has graciously offered to let us use their captioning service, it would still be an expense over \$5,000 per year. We may have to consider dropping the TV Mass from WCAX, relying only on free service from cable channels. (This would be unfortunate, because many of the

elderly and infirmed especially do not have cable coverage, and so rely on the statewide signal of WCAX TV in order to view the *TV Mass.*)

We were hoping perchance to qualify for an exception to the FCC's *Closed Captions Regulations* under "non-news programming with no repeat value" such as defined and provided by section 47 C.F.R. & 79.1(d)(8) and/or the "undue burden" clause.

Please consider helping us to continue serving our elderly and infirmed people in Vermont. I understand that we may continue with non-captioned programming until we hear back on this petition. Thank you so much for extending that courtesy to us.

Yours in public service,

A handwritten signature in black ink, appearing to read "Gloria J. Gibson". The signature is fluid and cursive, with the first name "Gloria" being more prominent.

Gloria J. Gibson
Director of Communications
Roman Catholic Diocese of Burlington
351 North Avenue
Burlington, VT 05401

ggibson@vermontcatholic.Org
(802) 658-6110, Ext. 300